

BRANDT FISHER ALWARD & ROY, P.C.**ATTORNEYS AT LAW****1241 E. EIGHTH STREET****P.O. BOX 5817****TRAVERSE CITY, MI 49696-5817****(231) 941-9660****Facsimile (231) 941-9568****DONALD A. BRANDT****JOSEPH C. FISHER****THOMAS R. ALWARD****EDGAR ROY III****MATTHEW D. VERMETTEN****THOMAS A. PEZZETTI, JR.****VICKI P. KUNDINGER****JOHN M. GROGAN****JAMES R. MODRALL III*****ANTHONY W. DEVINE****SUSAN JILL RICE†****TROY W. STEWART***** Also Admitted in Illinois and Wisconsin****† Also Admitted in Indiana****Other Location:****By Appointment Only****300 Ames Street****Elk Rapids, MI 49629****E-mail: eroy@bfarlaw.com****December 28, 2001****Via Facsimile and Mail: 517-373-2040****Thomas K. Rohrer****Enforcement Unit****Surface Water Quality Division****Knapps Centre****PO Box 30273****Lansing, MI 48909**

**Re: Chris Hubbell - Williamsburg Receiving & Storage, Inc.
NPDES Permit M10044741**

Dear Mr. Rohrer:

This letter is submitted as a preliminary response to your letter of December 4. In that regard, I enclose copies of the following documents:

1. Correspondence dated August 15, 2000 from Williamsburg Receiving & Storage with Work Plan Letter
2. Map of Facility/Discharge Facility dated January 26, 2000
3. Correspondence dated September 13, 2000 from DEQ (Roycraft)
4. Correspondence dated September 8, 2000 from me to DEQ

Note, I do not have in my file a copy of the NPDES permit or the Notice letter dated February 23, 2001 and, therefore, would appreciate your office providing me with a copy at your first opportunity so this letter can be supplemented.

With regard to the purported violation for July 14, 2000, I believe each of the issues has been addressed in the WRS Work Plan Letter dated August 15, 2000. It is also important to note that the pipeline running to Ptobeco Creek was plugged on or about September 24, 2001.



BRANDT FISHER ALWARD & ROY, P.C.
ATTORNEYS AT LAW

December 28, 2001

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With regard to the purported violation dated September, 2000, I do not know what to say other than there was reportedly a mechanical failure. I do not believe there has been any further mechanical failure which resulted in this type of discharge since that date.

With regard to the items listed under dates of December 27, January 5 and February 16, I am continuing to investigate those issues and will supplement this response. However, it is my understanding that no similar non-compliance issues have been identified since those dates.

With regard to the July 17, 2001 violation (spillage from brine pits north of building B entering roadside ditch), I believe this was an isolated incident and not repeated since that date nor as a result of the overflow was there any permanent harm/damage.

With regard to a modification of the permit due to the fact the pipeline was plugged, I would appreciate you providing the application for modification and also an explanation as to the procedure to be followed to apply for a discharge permit through another access point to Ptobeco which the baseline information from the original permit could be used in reviewing the modification or alternative permit.

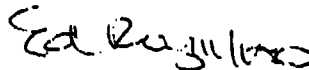
At page 3 of your letter you indicate that the proposed administrative consent order would contain a corrective program designed to eliminate all unauthorized discharges and to assure compliance with all applicable statutes. Since I believe the pipeline has been plugged so that no further discharges can occur, I am curious to know what corrective program is proposed.

I expect we can deal with this issue and the other claims of non-compliance with the groundwater discharge permit MOO836 once we receive the letter from Waste Management Division relative to their concerns of non-compliance.

Thank you for your continuing cooperation and attention to this matter.

Sincerely,

BRANDT, FISHER, ALWARD & ROY, P.C.



Edgar Roy III

ER/ljd

Enclosures

cc Chris Hubbell (via facsimile: 264-8774)

WILLIAMSBURG

RECEIVING &

STORAGE, INC.

10190 MUNRO RD.
WILLIAMSBURG, MI 49690

TELEPHONE (231) 264-5260
FAX (231) 264-8774

8/15/00

To Whom It May Concern:

While we do not necessarily agree with the accuracy of the notice of violation or that all items constituted a failure to comply with the permit, we have enclosed a proposed work plan letter in the spirit of co-operation.

If you have any questions, please feel free to call at the above phone number.

Sincerely,



Chris Hubbell-President
Williamsburg Receiving & Storage, LLC

WILLIAMSBURG**R ECEIVING &****S TORAGE, INC.**10190 MUNRO RD.
WILLIAMSBURG, MI 49690TELEPHONE (231) 264-5260
FAX (231) 264-8774**WORK PLAN LETTER**

8/15/00

Reply to notice letter NL-07-00-01-009C written by Sy Vongphasouk of the DEQ Surface Water Quality Division dated July 22, 2000.

Item 1. The drain sump with automatic sump pump will be installed at the end of blacktop located by the brine pits on the corner of Angell Road and Munro Road. This pump will pump any fluids from the blacktop or corner area back into our waste water system. This drain sump will be installed by September 15, 2000.

Item 2. Brine pits just North of the building. I'd like to point out to you that at no time has there been any brine running down the pavement from this area. The run-off down the paved area is caused by strictly water running out of the dewatering tank to waste which is water out of cherry tanks from the farmers. This water will be re-directed through a drain system installed to carry the water to the waste water sump. This item will be installed by September 15, 2000.

Item 3. Excess water from cooling pad operation being allowed to discharge to the storm drain. This water going to the storm drain in the parking lot is one in the same as to water going down the drains in the building since the building drains and storm drain pipes are hooked in conjunction to all run to the master pipe that runs into the waste water sump. We therefore do not believe any corrective measures are needed. We would welcome the opportunity to meet with you on site to demonstrate the fact that the water is being handled correctly.

Item 4. New discharge pipes and drains for lower cooling pad to waste water sump will be installed by June of 2001. This system will not be in operation again until July 2001.

Item 5. The solids screen will be installed at the outlet pipe of the waste water settling pit by June of 2001. I do, however, disagree with any hole cherries, pits or pulp being discharged down the pipe for I feel that the settling sump is doing a fine job based on inspection at the end of the pipe in the swamp at various times including the time with the DEQ and County Road Commission. At that time, none of us saw any whole cherries or pulp to my recollection. This will not be in operation again until July 2001.

Item 6. The monitoring reports - DMR's have been completed & sent to the proper address and we will send a copy to Sy Vongphasouk along with this work plan letter.

Thank-you,

Chris Hubbell
Williamsburg Receiving & Storage, LLCCC: Ms Maureen Kennedy, GT County Drain Comm.
Mr. Ross Childs, GT County Administrator
Mr. Jeff Fischer, MDEQ-SWQD, Lansing
Ms. Janice Heuer, MDEQ[WMD, Cadillac
Mr. Edgar Roy III, Brandt, Fisher, Alward & Roy,
P.C.

Exemption 9

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:
WASTE MANAGEMENT DIVISION
CADILLAC DISTRICT OFFICE
120 CHAPIN ST W
CADILLAC MI 49601

September 13, 2000

Mr. Edgar Roy III
Brandt Fisher Alward & Roy, P.C.
401 Munson Ave.
P.O. Box 5817
Traverse City, MI 49696-5817

Dear Mr. Roy:

SUBJECT: Williamsburg Receiving & Storage, Williamsburg

This correspondence is written to acknowledge receipt of your letter dated September 8, 2000, which itemizes actions taken by Williamsburg Receiving and Storage (hereafter Facility), located on Munro Road in Williamsburg, Michigan, to correct violation(s) of Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended, and any administrative rules promulgated pursuant to this act. These violations were observed by staff of the Department of Environmental Quality (DEQ) during an inspection conducted on July 14, 2000, and the Facility was notified of these violations in a letter dated August 11, 2000.

This is to notify the Facility, that based on the information in your letter, staff of the DEQ has determined that the Facility has corrected two of the three violation(s) identified with regard to the regulations cited.

In addition, in a telephone conversation dated September 11, 2000, you indicated that the secondary containment issue may be corrected, as the brine mixing tank may be empty at this time. I am enclosing a copy of the Part 5 rules promulgated under Part 31 of the NREPA as you requested. You questioned whether containment was needed around tanks stored indoors. The violation cited in the August 11, 2000 letter, was observed where the concentrated brine is mixed outdoors. Also, a brine spill was observed at the southwest brine pits where brine had flowed out of the pit area into a ditch at the corner of Angell and Munro Roads.

The DEQ has just received an additional complaint regarding possible brine spillage from a pipeline at the Facility. The photo's that accompany the complaint show an area of dead vegetation under what appears to be a break in a temporary pipeline. I am enclosing a photocopy of the photograph. While it is more difficult to see from the photocopy, it appears that a substance leaked from the pipe and killed vegetation. If brine is transferred from the brine mixing area via the pipeline that is drained onto the ground or is subject to spills, brine containment is not adequate.

Mr. Edgar Roy, III

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September 13, 2000

Please provide documentation regarding actions taken to correct the secondary containment violations by September 30, 2000. Please include an explanation of how brine is mixed at the Facility, and transferred to and from the brine pits.

This determination does not preclude nor limit the DEQ's ability to initiate other enforcement action, under state or federal law, as deemed appropriate.

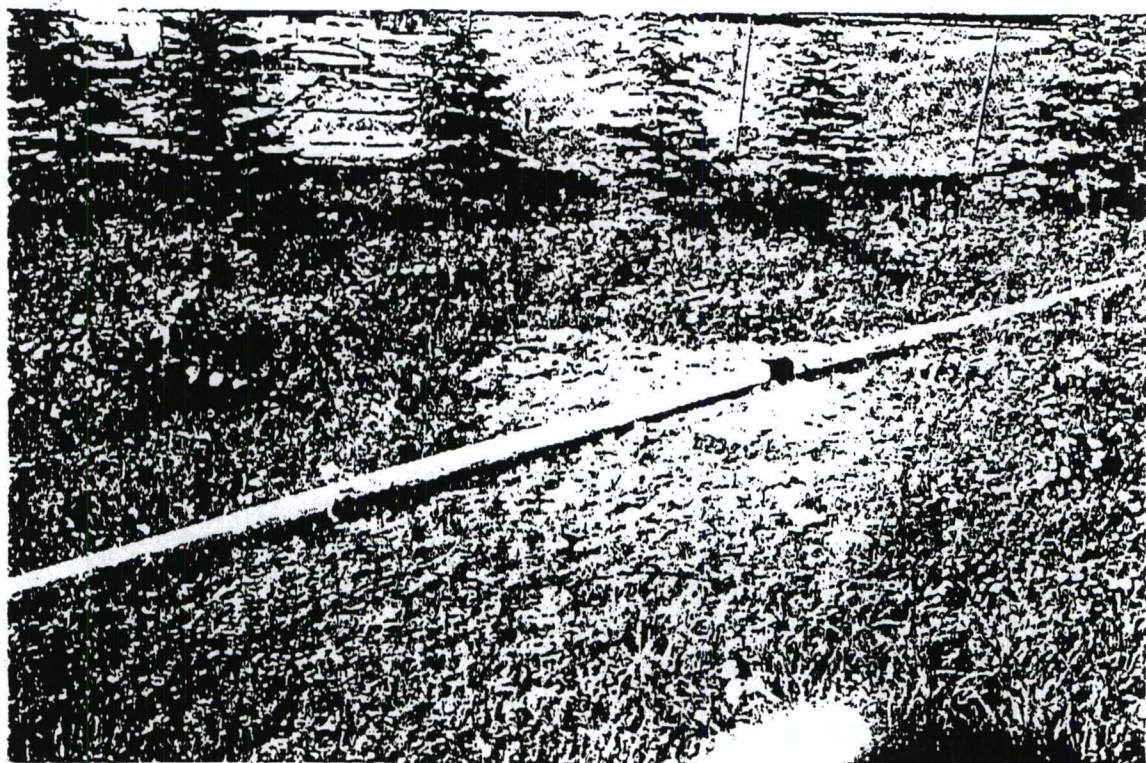
If you have any questions, please contact Ms. Janice Heuer at 231-775-3960, extension 6203, or myself at the number below.

Sincerely,



Philip Roycraft
District Supervisor
Waste Management Division
231-775-3960 Extension 6200

cc: Mr. Chris Hubbell Williamsburg Receiving and Storage, Inc.
Ms Maureen Kennedy, Grand Traverse County Drain Commissioner
Mr. Ross Childs, Grand Traverse County Administrator
Mr. Tom Weston, MDEQ-WMD, GWPS
Mr. Rick Rusz, DEQ-WMD, Enforcement Section
Ms. Sy Vongphasouk, DEQ-SWQD, Cadillac
Ms. Janice Heuer, DEQ-WMD, Cadillac



DEPARTMENT OF ENVIRONMENTAL QUALITY

ENVIRONMENTAL RESPONSE DIVISION

GENERAL RULES

(By authority conferred on the water resources commission by sections 2 and 5 of Act No. 245 of the Public Acts of 1929, as amended, sections 33 and 63 of Act No. 306 of the Public Acts of 1969, as amended, and Executive Order No. 1976-8a, being SS323.2, 323.5, 24.233, and 24.263 of the Michigan Compiled Laws)

PART 5. SPILLAGE OF OIL AND POLLUTING MATERIALS

R 323.1151 Definitions: A to O.

Rule 151. As used in this part:

(a) "Boom" means a floating containment device which may be rapidly positioned around an oil spill to prevent the movement or spread of such oil to adjacent water areas.

(b) "Oil" means oil of any kind or in any form, including, but not limited to, petroleum, gasoline, fuel oil, grease, sludge, oil refuse, and oil mixed with waste.

(c) "Oil spill clean-up cooperative" means an organization created by contractual agreement among persons engaged in on-loading and off-loading of oil and other persons, including governmental units, which provide and utilize booms and associated equipment to prevent the movement or spread of oil on the waters of this state in case of spillage thereof.

(d) "Oil storage facility" means a temporary or permanent land-based industry, plant, establishment, firm or other facility, except an oil field petroleum or brine storage facility and a recreational marina, so situated that oil could directly or indirectly reach the surface or ground waters of this state, including but not limited to, a facility which discharges through a sewer system, and which receives, processes, manufactures, stores, or ships oil, and has on hand at any time, oil in excess of 40,000 gallons or any other land-based facility which has on hand less than 40,000 gallons of oil if the commission determines that such facility should be subject thereto.

(e) "On-land facility" means a temporary or permanent land-based industry, plant, establishment, firm, storage site, or other facility so situated that loss of polluting materials could directly or indirectly reach the surface or ground waters of this state, including, but not limited to, a facility which discharges through a sewer system, and which receives, processes, manufactures, stores, or ships polluting materials.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1152 Definitions: P to V.

Rule 152. As used in this part:

(a) "Polluting material" means salt and any material listed on the critical materials register as prepared by the commission pursuant to section 6b of the commission act, in solid or liquid form.

(b) "Salt" means sodium chloride and calcium chloride in solid or liquid form.

(c) "Use area" means any area within an oil storage facility or on-land facility which is used for handling, treating, or processing oil or polluting materials.

(d) "Vessel" means a contrivance used or capable of being used for navigation upon water, whether or not capable of self-propulsion, including a foreign or domestic vessel engaged in commerce upon the waters of this state, and any other cargo carrying vessel or barge which

transports oil or polluting material.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1153 Vessels; booms for on-loading and off-loading oil.

Rule 153. Before oil is on-loaded or off-loaded through a conduit to or from a vessel on the waters of this state at an oil storage facility, booms, and associated equipment shall be available at the site to be positioned immediately to prevent the movement or spread of any oil on the waters of this state in case of the spillage thereof. Booms and associated equipment may be considered to be available at the site if the oil storage facility is a member of an oil spill clean-up cooperative which has received approval by the commission. Adequate personnel shall be available at all times to position the booms in the event of such spillage.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1154 Oil storage facilities; booms for oil.

Rule 154. An oil storage facility, adjacent to a watercourse, which stores or in any way handles oil, shall have available adequate emergency boom systems and associated equipment for containment of such oil in case of spillage thereof. Booms and associated equipment may be considered to be available if the oil storage facility is a member of an oil spill clean-up cooperative which has received approval by the commission. Immediately upon spillage, the booms shall be positioned by the oil storage facility or oil spill clean-up cooperative until all oil is removed, or, in the judgment of the commission, the oil no longer poses a threat to the waters of this state. Adequate personnel shall be available at all times to position the booms in the event of spillage.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1155 Oil storage and on-land facilities; surveillance.

Rule 155. (1) Upon any on-loading or off-loading of oil through a conduit to or from an oil storage facility, vessel, or other means of transport, adequate surveillance of the loading operation shall be maintained by the oil storage facility until all such operations are completed, so that any oil spillage can be immediately detected and procedures implemented to prevent its reaching the waters of this state.

(2) Oil storage and on-land facilities shall maintain adequate surveillance of all manufacturing processes, treatment systems, storage areas, and other such areas so that oil spillage or polluting material loss therefrom can be immediately detected and procedures implemented to prevent its reaching the waters of this state.

(3) Any person employed by an oil storage or on-land facility for such surveillance shall be knowledgeable in operations and procedures necessary to prevent oil or polluting material from reaching the waters of this state.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1156 Oil storage and use areas; emergency containment structures.

Rule 156. A storage or use area at an oil storage facility shall be diked, curbed, or otherwise structurally enclosed so as to be able to contain a volumetric capacity which is not less than the greatest amount of liquid that can be released from the largest tank within the diked area, assuming a full tank, unless a lesser containment area or alternate control measures are approved by the commission or its designated representative. The capacity of the diked area enclosing more than 1 tank shall be calculated by deducting therefrom the volume of the tanks other

than the largest tank below the height of the dike. The area shall be so constructed that no oil can escape therefrom by gravity through sewers, drains, or otherwise directly or indirectly into any sewer system or to the surface or groundwaters of this state, unless otherwise approved by the commission or its designated representative.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1157 Salt storage areas; emergency containment structure.

Rule 157. (1) Salt in liquid form stored at an on-land facility shall be diked, curbed, or otherwise structurally enclosed so as to be able to contain a volumetric capacity which is not less than the greatest amount of liquid that can be released from the largest tank within the diked area, assuming a full tank, unless a lesser containment area or alternate control measures are approved by the commission or its designated representative. The capacity of the diked area enclosing more than 1 tank shall be calculated by deducting therefrom the volume of the tanks other than the largest tank below the height of the dike. The area shall be so constructed that no salt can escape therefrom by gravity through sewers, drains, or otherwise directly or indirectly into any sewer system or to the surface or groundwaters of this state.

(2) Salt in solid form stored from more than 15 days at an on-land facility shall be enclosed, covered, or otherwise protected to prevent runoff, seepage, or leakage onto or into the surface or groundwaters of this state. Salt shall be stored not less than 50 feet from the shore or bank of any lake or stream unless otherwise required or approved by the commission.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1158 Polluting material storage and use areas; emergency containment structures.

Rule 158. (1) A storage or use area at an on-land facility for polluting material, except salt, in a liquid form shall be diked, curbed, or otherwise structurally enclosed so as to be able to contain not less than 150% of the liquid polluting material stored or used unless a lesser containment area or alternate control measures are approved by the commission or its designated representative. The area shall be so constructed that no liquid polluting material can escape therefrom by gravity through building sewers, drains, or otherwise directly or indirectly into any sewer system or the surface or groundwaters of this state, unless otherwise approved by the commission or its designated representative.

(2) Polluting material, except salt, in solid form stored at an on-land facility shall be located in security areas designed to prevent the loss of such materials to any sewer system or to the surface or groundwaters of this state.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1159 Exceptions.

Rule 159. (1) The discharge of solutions containing limited concentrations of oil, salt or polluting materials to the waters of this state or to sanitary sewer systems as specified in permits or orders of determination or final orders of determination made by the commission in accordance with the provisions of the commission act, or as permitted by a local ordinance which has the concurrence of the state department of public health, is not prohibited by R 323.1156, R 323.1157, or R 323.1158.

(2) If the commission determines that an oil storage facility which has on hand less than 40,000 gallons of oil may be a hazard to the surface or groundwaters of this state, such facility may be subjected to these rules

by a permit or order of determination of the commission.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1162 Pollution incident prevention plan.

Rule 162. (1) The owner, operator or manager of an oil storage or on-land facility shall file with the commission within 180 days after the effective date of these rules, or 30 days before the date of first use in case of new construction, a pollution incident prevention plan setting forth:

(a) The procedures by which such person proposes to prevent pollution of the waters of this state from storage and use areas, manufacturing processes, treatment systems, and shipping of oil and materials.

(b) The emergency clean-up procedures to be used in case of a spill, discharge, seepage, runoff, or leakage of oil or polluting materials into the waters of this state.

(c) The type of surveillance employed by such person.

(d) The method by which inventories are made of oil and polluting materials from the time the oil or polluting material is received or manufactured until such time it is treated and discharged or shipped out by the oil storage or on-land facility.

(2) If the commission determines that a pollution incident prevention plan prepared pursuant to subrule (1) is incomplete or inadequate, it may return such plan to the owner, operator, or manager of an oil storage or on-land facility with its findings and recommendations and request modification thereof. The owner, operator, or manager of the oil storage or on-land facility shall modify and resubmit the pollution incident prevention plan to the commission within 30 days following the commission's request.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1163 Oil spill clean-up cooperative members; change in status.

Rule 163. (1) If an oil storage facility which is a member of an approved oil spill clean-up cooperative withdraws from such cooperative, it shall notify the commission of its intention to withdraw and shall file a revised pollution incident prevention plan pursuant to R 323.1162 at least 30 days before the date of withdrawal.

(2) An oil storage facility shall not withdraw from the approved oil spill clean-up cooperative until the commission approves the revised pollution incident prevention plan submitted pursuant to subrule (1).

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1164 Pollution incident report.

Rule 164. The owner, operator, or manager of a vessel, oil storage facility, or an on-land facility which spills, or permits to be spilled, oil, salt, or polluting material shall immediately notify the commission and within 10 days after the spill shall file a report with the commission outlining the cause, its discovery, and the procedures taken to remove the oil, salt, or polluting material from the waters of this state. This rule does not supersede, rescind, or otherwise alter any other existing or future procedure, rule, or statute pertaining to pollution of the waters of this state.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

R 323.1169 Enforcement.

Rule 169. A person who violates any provision of this part is subject to the procedures and penalties prescribed in sections 7, 9, and 10 of the

commission act.

History: 1954 ACS 75, Eff. Mar. 22, 1973; 1979 AC.

BRANDT FISHER ALWARD & ROY, P.C. ATTORNEYS AT LAW

DONALD A. BRANDT
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VICKI P. KUNDINGER
JOHN M. GROGAN
JAMES R. MODRALL III
*Also Admitted in Illinois and Wisconsin

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Elk Rapids Office:
9060 North Bayshore Drive
P.O. Box 576
Elk Rapids, MI 49629
(231) 264-5614
Facsimile (231) 264-5785

Reply To: Traverse City Office

September 8, 2000

Via Facsimile: 231-775-1511

Philip Roycraft
DEQ - Waste Management Division
120 Chapin Street West
Cadillac, MI 49601

Re: Warning Letter to Williamsburg Receiving & Storage Dated August 11, 2000

Dear Mr. Roycraft:

I have been unsuccessful in attempting to contact you by telephone. Please consider this Chris Hubbell's (Williamsburg Receiving & Storage, Inc.) preliminary response.

1. With regard to item 1 (irrigating without a permit), Mr. Hubbell acknowledges having irrigated the effluent. However, this occurred as a result of the anticipated use of the lagoon as a reservoir for the cooling pad (wash water) as a result of a neighbor intentionally plugging the discharge pipe which has been in use for approximately thirty years. On behalf of Mr. Hubbell, I was required to go to Grand Traverse Circuit Court and obtain an injunction requiring removal of the log from the discharge pipe. As a result of this technical violation, it is believed that no harm has occurred to the environment and no further discharge will occur absent issuance of the permit.
2. We need clarification of the alleged rule violation. Specifically, is it the DEQ's requirement that the tanks within the pitting building be surrounded by the barriers or is it the DEQ's requirement that any brine tanks located outside of the pitting building be encased? Please advise so that we can prepare an appropriate response.
3. It is acknowledged that certain burning of pallets, cardboard, etc. have occurred from time to time on premise. Mr. Hubbell has now retained the services of a waste hauling company which will remove the items which have been previously disposed of by burning.

BRANDT FISHER ALWARD & ROY, P.C.
ATTORNEYS AT LAW

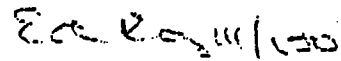
September 8, 2000

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I would appreciate you contacting me upon your receipt of this correspondence to discuss the outstanding issues. Thank you.

Sincerely,

BRANDT, FISHER, ALWARD & ROY, P.C.



Edgar Roy III

ER/ljd

cc Chris Hubbell (via facsimile: 264-8774)

COMPLAINT

COMPLAINT # _____

DATE OF CALL: 12-4-01PERSON RECEIVING CALL: Steve AlwardenTIME OF CALL: 8:30 AMSTAFF PERSON ASSIGNED: Steve Alwarden

INFORMATION SOURCE

COMPLAINANT/SOURCE: Taymouth Township OfficePHONE #: (Home) 624-4154 / (Work) _____

ADDRESS: _____

NATURE OF COMPLAINT

NAME OF FACILITY (if applicable): _____

ADDRESS/LOCATION: _____

TOWNSHIP: _____ COUNTY: SAGINAW

PERSON RESPONSIBLE FOR NUISANCE: _____

PROPERTY OWNER: _____

MAILING ADDRESS: _____

PHONE #: (Home) _____ / (Work) _____

DESCRIPTION OF COMPLAINT: Unknown caller, revealed information that Wayne Wellman was dumping sewage back in the woods off F Busch Road.DATE & TIME OF OCCURRENCE: unknown

INVESTIGATION/RESPONSE

DATE: 12-13-01 PERSON INTERVIEWED: Noone at siteCOMMENTS/DESCRIPTION: Site visit was made at 1:00 PM.

Area where sewage disposal was previously licensed but has been revoked due to improper operation, is now being excavated and worked at this present time. Strong smell of sewage. Visible fecal scraps (smells like pig manure) (Will follow up)

ENVIRONMENTAL HEALTH SPECIALIST: Steve Alwarden